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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

WITOLD BAGINSKI
Plaintiff,

v.

BOROUGH OF WALLINGTON, et al.
Defendants.

:
: CIV. A. 2:17-cv-05320-
: JLL- LAD
:
: **[PROPOSED] ORDER**
:
: **Motion Date:**
:
: *Document Filed*
: *Electronically*

THIS MATTER having been brought to the Court by way of Plaintiffs' Motion for the Imposition of Sanctions, including, but not limited to: (1) the suppression of Defendants' pleadings and the striking of Defendants' defenses; (2) the payment of all counsel fees and costs necessitated by reopening discovery and investigating Defendants' unethical conduct; and, (3) the disqualification of counsel for obtaining Plaintiff's attorney-client privileged emails, in violation of, *inter alia*, RPC 4.4(b). and the Court having considered the papers submitted on behalf of the parties, and good cause having been shown,

IT IS, on this _____ day of _____,
2020,

ORDERED that Plaintiffs' Motion for the Imposition of Sanctions upon Defendants and Defendants' Counsel is hereby **GRANTED** in its entirety, and it is further

ORDERED that Defendants' pleadings and defenses shall be and are hereby suppressed and stricken, respectively, and it is further

ORDERED that Defendants and Defendants' Counsel shall be and are hereby compelled to pay Plaintiffs' Counsel all counsel fees and costs necessitated by reopening discovery and investigating Defendants' unethical conduct; and it is further

ORDERED that discovery shall be and is hereby reopen; and it is further

ORDERED that Defendants' counsel shall be and is hereby disqualified from the above-captioned matter for obtaining Plaintiff's attorney-client privileged emails, in violation of, *inter alia*, RPC 4.4(b); and it is further

ORDERED that a copy of this Order shall be served upon opposing counsel within ____ days hereof.

HON. JOSPEH DICKSON, U.S.M.J.

Dated: